

Actual data or loop qualification, is specific loop make-up information for an actual loop serving the requested end user's address or telephone number. In most cases, actual loop make-up information is inventoried in Ameritech Illinois electronic databases.

When actual information is not available electronically, Ameritech Illinois gives CLECs an option. They may request designed/archived actual loop make-up information or alternatively, they can request a manual look-up of the actual loop make-up information.

A Designed/Archived Actual inquiry provides a detailed loop qualification using a pre-ordering validated address to obtain design/archived actual results. Loop Qualification searches for the submitted address in its designed/archived actual database and returns the loop make-up. The archived actual inquiry will generally provide a faster response than the actual inquiry.

With the March 24, 2001 implementation, a CLEC also has the option of submitting a manual loop qualification request for loop make-up information via the Enhanced Verigate and EDI/CORBA interfaces. When a CLEC makes a request for manual loop make-up information, the request is forwarded to Outside Plant ("OSP") Engineering electronically. OSP Engineering will complete the request within three to five business days and update the information in the loop qualification database where it is available for viewing by the CLEC. In addition, upon request, Ameritech Illinois will return the results of manual look-ups to an e-mail address pre-designated by the CLEC.

A completed manual loop qualification contains all the information in Ameritech Illinois' electronic and paper records about the status of a particular loop.¹ This information allows a CLEC to determine whether a loop to the requested premise is "capable of supporting xDSL and other advanced technologies,"² and to plan for and avoid provisioning problems stemming from technical or other facility-related limitations.

Q. Is the actual, archived actual or manual loop information that Ameritech Illinois provides to a CLEC the same information it would provide to its advanced services affiliate (Ameritech Advanced Data Services, or AADS)?

A. Yes. The information provided via loop qualification is precisely the same mechanized information that Ameritech Illinois provides to its advanced services affiliate for its operations. Thus, using loop qualification, CLECs have nondiscriminatory access to the same information that is available to Ameritech Illinois' advanced services affiliate.

Q. What loop qualification information is available via Verigate and EDI/CORBA?

A. A CLEC submitting a loop qualification request supplies Ameritech Illinois with an address or Working Telephone Number ("WTN") for which it wants loop makeup information. Ameritech Illinois takes that information, feeds it into its systems, and returns loop makeup information. The loop makeup information provides the CLEC with all the data it needs to determine the loop's ability to support a particular service (including xDSL service), such as: the 26 gauge equivalent loop length; the length of the

¹ See *UNE Remand Order*, 15 FCC Rcd at 3885, ¶ 427.

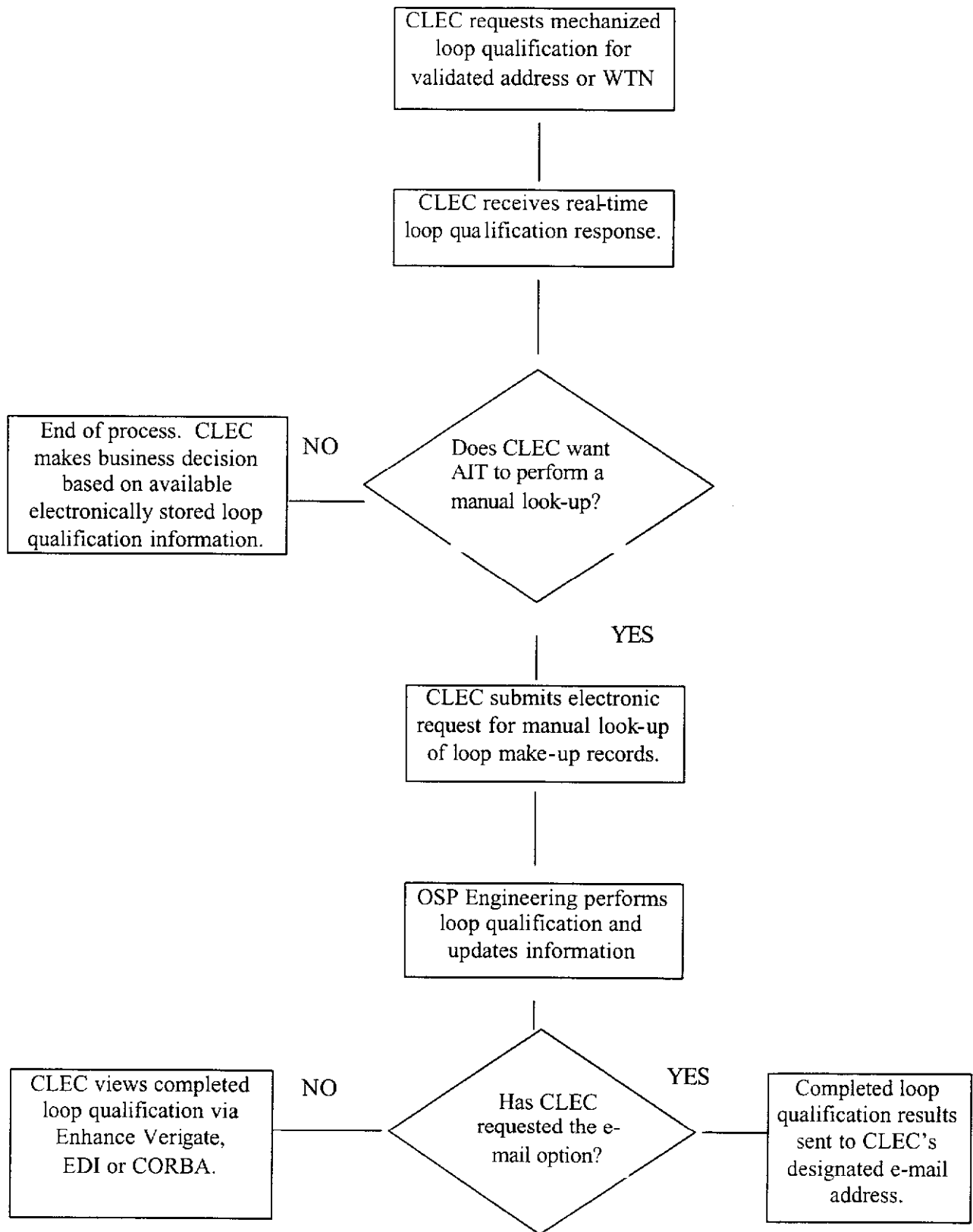
² *UNE Remand Order*, 15 FCC Rcd at 3884-885, ¶ 426.

loop by gauge; the quantity of bridged tap, load coils, and repeaters present on the loop; the length of the feeder cable ("F1") and the distribution cable ("F2") respectively; the presence (or absence) of Digital Loop Carrier ("DLC") equipment in the loop; and the presence of potentially disturbing technologies and in the same and/or adjacent binder groups; and other information. I have attached as Schedule JMM-2, Chapter 8 of the Verigate Users Guide. This illustrates, using Verigate screen prints, the input required and the results received on the following inquiries:

- Actual Data Loop Inquiry by Address.
- Manual Loop Qualification report request – Address
- Manual request – View Manual Results – Address
- Manual Request – View Manual Results- Address – Request Not Found
- Actual Data Loop Qualification Inquiry by Working Telephone Number (WTN)
- Manual Loop Qualification Report Request – WTN.
- Manual Request – View Manual Results – WTN
- Design/Archived Actual Loop Qualification Inquiry - Address

The information returned to the CLEC is as complete and accurate as the data contained in Ameritech Illinois' databases and engineering records allows, and enables a CLEC to plan for and avoid provisioning problems stemming from technical limitations. An illustration of the loop qualification process is attached:

Loop Qualification Process



Q. What new loop qualification features are now available as a result of the March 24 release?

A. Prior to the March 24 release the only loop qualification inquiry available to the CLECs was an Actual Query. The Actual Query performed a detailed loop qualification using a pre-ordering validated address or WTN to obtain actual loop make-up results from production LFACS and Ameritech Records and Engineering System (ARES). Loop Qualification searches for the submitted address or telephone number in the LFACS and ARES databases and returns loop make-up information on an actual loop. The Actual Query provides the most current and up-to-date mechanized results that are available. The Actual Query loop make-up process did not change with the introduction of Enhanced Verigate and EDI/CORBA. More information on this process can be found in the testimony of Mr. Mileham.

Improvements in the Ameritech Illinois loop qualification process include the addition of three inquiries with the March 24, 2001 release. This will make the Ameritech Loop Qualification process more consistent with the process in the other SBC regions and will be the foundation for the common 13-state Loop Qualification process. The following are new inquiries for Ameritech Illinois:

Archived Actual: Performs a detailed loop qualification using a pre-ordering validated address to obtain archived actual results. Archived Actual results are based on the production LFACS/ARES information, but are refreshed monthly. Loop Qualification searches for the submitted address (or telephone number) in its archived actual database

and returns the loop make-up. The archived actual inquiry will generally provide a faster response than the actual inquiry. More information of this process can be found in the testimony of Mr. Mileham.

Request MLR: Refer a loop qualification request to the Engineers. This will require the following steps: (a) CLEC submits a request via Enhanced Verigate or EDI/CORBA; (b) The loop qualification system then generates a request to Engineering for loop make-up to be pulled and a populated in an electronic form. The loop make-up data is then stored in the loop qualification database for later retrieval by the CLEC and an e-mail containing the same information is sent back to the CLEC.

Retrieve MLR: Query the Loop Qual database by Service Address or WTN for results of a previous Manual Loop Request ("MLR"). The CLEC may option to retrieve a previously completed MLR from the database. If an MLR record exists in the database for the service address or WTN in question it will be returned and displayed. Otherwise a 'MLR does not exist' message is returned.

- Q. What would be required in order for Verigate and EDI/CORBA to provide loop make-up on up to 10 loops as specified in the Commission's January 24 Order?**
- A.** In order to provide up to 10 available loops, Ameritech Illinois would need to provide at least 10 separate screen shots, one for each loop. It would require 10 iterations for the CLEC to look through. Functionality would need to be added to the Verigate, EDI, and CORBA interfaces. This would require time and resources for business requirements to

be validated and written, IT resources for programming and subsequent testing. This would also require changes for the CLECs. For the EDI/CORBA interfaces, the CLECs would have to provide time and resources for programming to retrieve this additional data. This would also have to be prioritized and implemented per the Change Management Process ("CMP"). The 13-state CMP was developed to allow CLECs input and agreement on any change in business processes. The SBC/CLEC change management process was developed in collaboration with all CLECs in all regions of SBC to facilitate planning coordinating, monitoring and communicating interface and system changes. Additional changes would be required in the Network back-end provisioning systems and loop qualification as outlined in Mr. Mileham and Mr. Zills's testimony.

Q. The Commission's January 24 Order also required that the CLEC be able to specify a particular loop. Is it possible that providing a unique identifier for each loop will cause a change in the ordering process?

A. Currently there is no field, on the industry standard Local Service Request ("LSR"), that would provide a unique identification for a stand-alone loop. Based on how the identification is made, a field on the LSR would have to be determined that could be used for the CLEC to notify us when ordering which loop to use. The service orders created as a result of the LSR would also have to be revised to accommodate this additional provisioning information. This again requires resources for investigating the changes and writing the business requirements. Additionally, the changes will entail IT resources to program and test the changes before implementation. This would also impact the

CLECs' process and procedures. In the Enhanced Verigate interface, an additional field would have to be determined and populated. Also, for the EDI/CORBA interfaces, the additional field that would have to be determined and populated would require programming resources for the CLECs in order to automatically populate the LSR. Additional changes would be required in the Network back-end provisioning systems as outlined in Mr. Zills's testimony.

Q. If changes to the industry standard LSR are required, is this an issue that should go through Change Management Process?

A. Yes, any changes to the business rules affecting the CLECs, should be presented to all the CLECs at the change management meeting. The 13-state CMP was developed to allow CLECs input and agreement on any change in business processes. It was developed in collaboration with all CLECs in all regions of SBC to facilitate planning coordinating, monitoring and communicating interface and system changes.

Q. Based on your understanding of the pre-ordering information that is available to CLECs now, and compared to the significant costs and time to implement the changes required by the Commission's Order, do you believe that the Commission's new requirements are justified?

A. No. There is additional functionality provided as a result of the March 24, 2001 release as described above. Also, due to the time and resources required by SBC and the CLECs, the resulting benefits don't outweigh the expenses associated with these new requirements that would be incurred by both SBC and CLECs to implement the

Commission's January 24 Order. Furthermore, these new requirements would have to be implemented through the agreed upon by SBC and CLECs 13 state Change Management Process.

Q. Please summarize your testimony.

A. The January 24 Order's requirement that Ameritech provide qualification information on multiple loops and that Ameritech also enable CLECs to order specific loops, would require changes to existing systems and procedures, at substantial costs in dollars and diverted resources, for little or no practical benefit to CLECs. The CLECs would also require resources on their side to implement. The March 24, 2001, release in Ameritech Illinois, provides CLECs the opportunity to easily obtain both loop pre-qualification and qualification information in the same manner as Ameritech's Advanced Data Services personnel.

Q. Does this conclude your rebuttal direct testimony?

A. Yes.